

*Lead Mine
Tailings
1670*

SITE	BIG RIVER MINE
ID#	N00981126899
BREAK	179
OTHER	AR
	2-19-81

Mr Robert Schreiber
Missouri Department of Natural Resources
P O Box 1368
Jefferson City, Missouri 65102

40111165



SUPERFUND RECORDS

Dear Mr Schreiber

We were pleased to learn from your letter of January 21, 1981, and subsequent discussions with David Wagoner, that the Missouri Department of Natural Resources had initiated discussions leading to the resolution of the problems caused by the Desloge Big River lead tailings site. It is our understanding that you and your staff will be discussing corrective actions with the St. Joseph Mineral Corporation at a meeting in late February. We also understand these discussions will be formalized in March.

Our staff has several technical items that might be included in your agreement. These items are:

- 1 Slope analysis and stabilization to further prevent catastrophic failures of the tailings pile
- 2 Provision for perpetual maintenance of the slopes.
- 3 Increased surveillance of the sanitary landfill to ascertain the impact of leachate on the tailings pile and the Big River
- 4 Assess the environmental impact of reclaiming the Big River benthic deposits contaminated by the tailings. If appropriate, then implement a reclamation program.

As you are aware, we have been considering a number of activities to solve the tailings problem, including Superfund and enforcement actions. Because of your initiative of beginning discussion with St. Joseph Mineral Corporation, we will hold such actions in abeyance. We urge you, however, to conclude your discussions quickly and begin implementing the provisions of an agreement as soon as feasible. I ask that you let us know by mid-April of the progress your Department has made in solving this problem. We will re-evaluate our alternatives and the need for further action at that time.

ARHM HAZM TSS TBuechler pc x6531 2/19/81

CONCURRENCES

SYMBOL	TSS	HAZM	ENFC	ARHM	SVAN	DRA	RGAD	
BUECHLER	Buechler	McLaughlin	Steinhaus	Sprattlin	Walker	B Rice	151 Rice	
DATE	2/20/81	2/20/81	2/20/81	2/20			2/28/81	

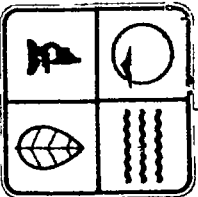
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We wish you the best of luck in pursuing the appropriate solution to this most difficult situation

We also have attempted to formulate an answer to your proposal on applying the \$128,000 as your share of Superfund activities in Missouri. We expect to give you our reply on this issue in the very near future

Sincerely yours,

Kathleen Q. Camin, Ph.D.
Regional Administrator



January 21, 1981

Ms. Kathleen Q. Camm, Ph.D.
Regional Administrator
U.S. Environmental Protection Agency
Region VII
324 East 11th Street
Kansas City, MO 64106

Dear Ms. Camm:

KM

I appreciated the opportunity to speak with you by telephone on January 9, 1981 regarding the designation of potential sites for Superfund. In this letter, I would like to take the opportunity to confirm our conversation and to report some rather disconcerting developments reported from Washington regarding the way EPA anticipates implementing Superfund.

The Department of Natural Resources' staff had earlier provided EPA with a proposal for the use of clean-up funds for uncontrolled hazardous waste sites in Missouri. I am enclosing a copy of that report for your reference. As I indicated by telephone, we are concerned about EPA's recommendation that the Desloge Big River Lead Tailing Site be considered for investigation with Superfunds. This recommendation was included in your December 22, 1980 letter to me. You should be aware that St. Joe Lead Company has agreed with DNR that they will take appropriate steps to correct problems involving the Big River. We are further concerned with the designation of Desloge Big River Lead Tailing Site in view of the fact that this waste is not a hazardous waste, in accordance with the EPA regulations or the state hazardous waste regulations. It does not appear appropriate to utilize the limited Superfund monies that we believe Congress intended for the clean-up of the most hazardous waste problems in the country.

You will note from our attached report that the Department of Natural Resources is recommending the immediate clean-up of miscellaneous Missouri dump sites, which contain hazardous waste. These sites are located throughout the State of Missouri, and the Department of Natural Resources believes that they present a potential hazard to the public in their uncontrolled condition. Responsible parties for the clean-up of these wastes have not been identified by the department to date. We have required responsible parties to clean up other similar sites during the past several years, and we will continue to pursue whoever may have been responsible for the improper disposal of these wastes even if state or federal funds are utilized for the clean-up.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

P.O. Box 1368

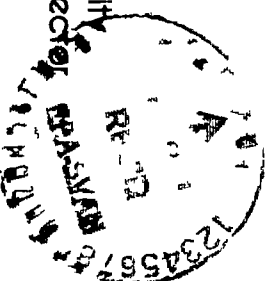
1915 Southridge Drive

Jefferson City Missouri 65102

(314)751-3241

Joseph P. Teasdale Governor
Fred A. Lofser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director



Ms Camin
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January 19, 1981

You may be aware that the State of Missouri has \$128,000 available during FY-81 for the clean-up of uncontrolled hazardous waste sites. These funds must be used and obligated by July 1, 1981, otherwise the money will revert to General Revenue. In view of the fact that it is necessary for EPA to develop regulations for implementation of Superfund, it would at this time appear unlikely that any sites in the State of Missouri will be scheduled for clean-up prior to July 1, 1981. The state would like to be able to utilize the \$128,000 for the clean-up of as many sites as possible and then receive a credit for the state's ten percent match, which is required by the Superfund legislation. We would also be able to obtain early clean-up and response, which we believe is important to the safety of the citizens of Missouri and was the desire of the Missouri Legislature. As your letter indicates, Section 104(C) indicates that the state needs to sign a contract or cooperative arrangement with the President in order to receive credit for the expenditure of state funds. The disconcerting matter is that we have learned from the EPA Superfund staff in Washington this week that the state's match will be required for each individual site, therefore, the state would not be able to clean up several sites and be given credit in advance of EPA cleaning up sites in the future with federal funds. This type of policy decision and implementation of the Superfund discourages states from proceeding to address the problem, and what is more illogical is that it would encourage the state to spend only a small amount of money on a site to partially clean up the site and wait for federal funds, which may never arrive, leaving the hazard to remain in the community. We realize these are only preliminary policy decisions which have been made by Superfund staff in Washington. We appeal to you to assist the State of Missouri to appeal to the EPA Superfund administrators to revise their policy in the best interest of the states and the federal government in cleaning up hazardous waste sites to protect the public health and welfare in an expeditious manner without a lot of "red tape" and the waste of the limited resources on partial solutions to the problems.

Sincerely,



Robert Schreiber
Director
Division of Environmental Quality

RS RMR pd1

cc Mr Fred A Lafser, Director, DNR

PROPOSAL FOR USE OF CLEAN-UP FUNDS FOR
UNCONTROLLED HAZARDOUS WASTE SITES IN MISSOURI

In accordance with the passage of the Federal 'Superfund' bill, and the appropriation of \$128 000 of Missouri funds to clean up uncontrolled hazardous waste sites it is proposed that these funds be utilized as soon as possible to clean up sites where hazardous materials have been improperly disposed of and abandoned. In order to most effectively hasten the action to be taken it is recommended that the Missouri Department of Natural Resources enter into agreement with EPA which designates Missouri's \$128 000 clean-up funds as matching funds to be used with the "Superfund". Such an agreement would allow the Missouri Department of Natural Resources to use its clean-up funds to perform remedial action at selected uncontrolled hazardous waste sites with the understanding that EPA will reimburse 90% of the clean-up costs to the Missouri Department of Natural Resources from the "Superfund".

It is proposed that EPA and MDNR enter into a contract, to ensure reimbursement of Missouri funds, no later than January 31, 1981, so that state funds can be committed before the end of fiscal year 1981. Assuming that EPA and MDNR agree to the terms of the contract by January 31, 1981, the work could be completed on selected sites according to the following schedule:

January 31, 1981	EPA and MDNR enter into a contract to arrange for the administration of "Superfund" and state clean-up funds
February 1, 1981	MDNR begins accepting bids for remedial action at selected uncontrolled hazardous waste sites
March 31, 1981	MDNR closes bidding for remedial action at selected uncontrolled hazardous waste sites
April 15, 1981	MDNR selects which bidder(s) will be awarded a contract to perform remedial action at selected uncontrolled hazardous waste sites
May 1, 1981	MDNR award bidder(s) contract(s) for performing remedial action at selected uncontrolled hazardous waste sites
May 10, 1981	Contractor(s) begin work on cleaning up selected sites
July 1, 1981	Contractor(s) complete work agreed upon
July 31, 1981	MDNR pays contractor(s) for work agreed to
August 1, 1981	MDNR applies for reimbursement from EPA "Superfund"

The preceeding schedule offers several advantages. It allows state clean-up funds to be committed prior to the end of fiscal year 1981. The schedule also allows the actual clean-up work to be performed at least six months before we could realistically expect to be awarded federal funds for the project. This schedule also gives EPA seven months from the time they enter into agreement with MDNR to reimburse funds, to the time money actually changes hands. This will allow MDNR to plan for the use of the reimbursal funds.

At this time, ten sites have been targeted as possible candidates for the use of clean-up funds. It is proposed that clean-up of the drum sites be let out under one or two separate contracts. The Fulbright Landfill and Conservation Chemical Site will require the letting of contracts to develop remedial action plans before a decision can be made regarding clean up or containment. These projects as proposed, are as follows, listed in order of priority.

PROJECT 1 - Miscellaneous Missouri Drum Sites

Because of the similarity of the work to be performed at eight drum sites, and to reduce the cost of contract overhead, it is proposed that eight uncontrolled hazardous waste sites be cleaned up under one or two contracts. Each site is relatively small individually, but the combined potential for environmental hazard is large. These sites are as follows:

- (a) Morse Mills Drum Site - This site in Jefferson County, consists of about 100 drums containing material which has up to 5,200,000 ug/kg naphthalene and 9,500,000 ug/kg Bis-(2-ethylehexyl)phthalate. Many of the drums are in poor condition and are situated in a ravine which drains to Big River. The responsibility of the contractor will be to remove the drums and contaminated soil to an approved disposal facility. MDNR will provide laboratory support and supervise the work.
- (b) Hardt Road Site - This site near Ellisville consists of about 100 55-gallon drums containing what is believed to be furniture finishing wastes. These drums were dumped on private property without the knowledge of the property owner by a hauler who is now deceased. The generator of the wastes is unknown. The contractor will remove these wastes to an approved disposal facility. MDNR will provide laboratory support and supervise the work.
- (c) Rosalie Investments - In Ellisville, this site consists of about 300 drums of PCB and other organic chemical contaminated materials situated in a stream bank. The responsibility of the contractor will be to remove the wastes and contaminated soil to an approved disposal facility. MDNR will provide laboratory support and supervise the work.
- (d) Angelo Maro - At Ellisville, this site consists of an unknown number of drums. These drums contain miscellaneous organic chemicals. The drums are situated on the banks of a creek. The duty of the contractor will be to remove the drums and any contaminated soil to an approved disposal facility. MDNR will provide laboratory support and supervision of the work.

- (e) Phoenix School - This site near Walnut Grove consists of nine drums containing a sludge with 9,800 ppm napthalene. Efforts to find the responsible party have been useless. The contractor will remove the drums and any contaminated soil to an approved disposal facility. MDNR will provide laboratory support and supervise the work.
- (f) South County Shopping Center - In St. Louis, this site consists of two drums of an unknown green sludge which were abandoned on the parking lot of a shopping center. The contractor's duty will be to remove these drums to an approved disposal facility. MDNR will provide laboratory support.
- (g) Drum Dumping Area - Union - Near Union, on the property of an elderly woman, 16 drums of unknown origin remain after the clean-up of about 150 drums at that site by Meramec Industries. Meramec Industries denied responsibility for the remaining drums. Efforts to track down the responsible party have been fruitless. The duty of the contractor will be to remove the drums to an approved disposal facility. MDNR will provide laboratory support and supervise the work.
- (h) High View Drive Dump - Near Antonia, this site consists of about 180 drums of unknown origin which contain a plastic sludge-like material resembling adhesive waste. The owner of the property discovered the drums when he bought the property. The previous owner denied any knowledge of the drums. Efforts to track down a responsible party have been fruitless. The responsibility of the contractor will be to remove the drums and any contaminated soil to an approved disposal facility. MDNR will provide laboratory support and supervise the work.

PROJECT 2 - Fulbright Landfill

This Springfield landfill had pit areas designated for liquid plating wastes from Royal-McBee. These wastes contained chromium, copper, cadmium, zinc, cyanate, nickel, plater paints and acids. It is estimated that about 5,000 - 6,000 gallons of waste were disposed of here. When the pits were closed out, about two - three feet of rubber V-belts were placed atop it, which will make excavation more difficult. This site is adjacent to a creek. MDNR will do further study to determine the extent of clean-up efforts to be required. However, extensive study under contract may be needed to develop a remedial action plan.

PROJECT 3 - Conservation Chemical Site (K C)

The Conservation Chemical Site in Kansas City has been investigated by EPA Region VII. Preliminary ground water monitoring would indicate this land disposal site in the flood plain is contaminating the shallow ground water. No public water supplies are obtained from this local ground water. The potential harm to industrial ground water supplies and the effect upon the large surface water streams from the ground water discharge is unknown. An extensive study is needed to develop a remedial action plan for this site. It is highly unlikely that the site owner is financially able to underwrite the cost of the study, plan development, and remedial action if necessary. Therefore it is recommended that EPA use "Superfund" to continue work of this site.